

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STEPHEN McCOLLUM and SANDRA	§	
McCOLLUM, individually, and	§	
STEPHANIE KINGREY, individually and	§	
as independent administrator of the	§	
ESTATE OF LARRY GENE	§	
McCOLLUM,	§	CIVIL ACTION NO. 4:14-cv-03253
Plaintiffs,	§	
	§	
v.	§	
	§	
BRAD LIVINGSTON, et al.,	§	
Defendants.	§	

DR. CHARLES ADAMS' OBJECTIONS AND RESPONSES TO PLAINTIFFS'
SUBPOENA DUCES TECUM ATTACHED AS EXHIBIT A TO THEIR APRIL 11, 2016
NOTICE TO TAKE DR. CHARLES ADAMS' DEPOSITION

EXHIBIT A

RECEIVED 04/11/2016 12:59

From: Edwards Law

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To: +15124959139

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STEPHEN McCOLLUM, and SANDRA
McCOLLUM, individually, and STEPHANIE
KINGREY, individually and as independent
administrator of the Estate of LARRY GENE
McCOLLUM,

PLAINTIFFS

v.

BRAD LIVINGSTON, JEFF PRINGLE,
RICHARD CLARK, KAREN TATE,
SANDREA SANDERS, ROBERT EASON, the
UNIVERSITY OF TEXAS MEDICAL
BRANCH and the TEXAS DEPARTMENT OF
CRIMINAL JUSTICE.

DEFENDANTS

CIVIL ACTION NO.
4:14-cv-3253
JURY DEMAND

**PLAINTIFFS' NOTICE TO TAKE THE ORAL DEPOSITION OF
DR. CHARLES ADAMS AND SUBPOENA DUCES TECUM**

TO: **Dr. Charles "Danny" Adams** by and through attorney of record, Lee Haney,
Assistant Attorney General, P.O. Box 12548, Capitol Station Austin, Texas
78711.

Please take notice that on May 18, 2016, at 8:00 am and thereafter from day to day until completed, Plaintiffs will take the oral deposition of Defendants' expert witness Dr. **Charles Adams**. The witness is required to provide by May 11 the documents and other items described in Exhibit "A," which is attached hereto and incorporated herein.

The deposition is for the purpose of discovering, securing, and completing testimony of the witness. The deposition will be taken at the Office of the Attorney General of Texas in Austin, 300 West 15th Street, Austin, TX 78701 and will continue thereafter from day to day until completed. The deposition will be recorded

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stenographically and may be videotaped.

Dated: April 11, 2016.

Respectfully submitted,

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The Haehnel Building
1101 East 11th Street
Austin, TX 78702

Tel. (512) 623-7727

Fax. (512) 623-7729

By: /s/ Jeff Edwards

JEFF EDWARDS

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CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through email and/or fax.

Cc: Cynthia Burton,
Assistant Attorney General
P.O. Box 12548
Capitol Station
Austin, Texas 78711
Facsimile: 512-495-9139

Graig Alvarez
Fenelius Alvarez Simon PLLC
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Exhibit A

The categories of documents, items and things which the deponent is directed to produce by May 11 are as follows: As used below, the term "you" includes your staff and all individuals and entities working at your direction.

1. All documents you have reviewed in preparation for your deposition.
2. All documents or other materials you have reviewed, consulted, or relied upon in forming your opinions or conducting your work in connection with this case.
3. All documents evidencing any agreement between you and TDCJ or their attorneys or representatives.
4. All documents or other materials provided to you by counsel for Defendants in connection with this case.
5. All notes you have prepared or documents you have created in connection with this case.
6. Any documents you reviewed regarding decisions not to air condition any Texas Department of Criminal Justice prison facility.
7. Your most recent curriculum vitae.
8. Any correspondence, reports, deposition transcripts, or demonstrative exhibits pertaining to any Texas inmate that suffered heat exhaustion, heat stroke, or other heat-related illness, including Eugene Blackmon, for which you were an expert witness on behalf of either TDCJ or UTMB.